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16 Attorneys for WAYMO LLC

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

19 WAYMO LLC,

20 CASE NO. 3:17-cv-00939-WHA

21 Plaintiff,

22 vs.
23 **DECLARATION OF LINDSAY COOPER
24 IN SUPPORT OF PLAINTIFF WAYMO
25 LLC'S ADMINISTRATIVE MOTION TO
26 FILE UNDER SEAL ITS REPLY TO
27 DEFENDANTS' MOTION RE
28 DILIGENCE OF EMPLOYEES'
PRIVILEGE WAIVER**

29 UBER TECHNOLOGIES, INC.;
30 OTTOMOTTO LLC; OTTO TRUCKING
31 LLC,

32 Defendants.

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1 I, Lindsay Cooper, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
 3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
 4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
 5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under
 7 Seal (“Waymo’s Administrative Motion”) its reply brief to Defendants’ motion regarding Diligenced
 8 Employees’ waiver of privilege (“Waymo’s Reply”). Waymo’s Administrative Motion seeks an order
 9 sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo’s Reply	Highlighted in blue	Defendants
Exhibits 1-3 to Waymo’s Reply	Entire document	Defendants

13 3. Waymo’s Motion and exhibits contain information that Defendants have designated as
 14 confidential and/or highly confidential.

15 4. Waymo takes no position on the merits of sealing the designated material, and expects
 16 Defendants to file one or more declarations in accordance with the Local Rules.

17 I declare under penalty of perjury under the laws of the State of California that the foregoing is
 18 true and correct, and that this declaration was executed in San Francisco, California, on September 26,
 19 2017.

20 By /s/ Lindsay Cooper

21 Lindsay Cooper
 22 Attorneys for WAYMO LLC

23 **SIGNATURE ATTESTATION**

24 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the
 25 filing of this document has been obtained from Lindsay Cooper.

26 /s/ Charles K. Verhoeven
 27 Charles K. Verhoeven